

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISIONS
C.A. No. 3:19-cv-00590-FDW**

LEGRETTAF. CHEEK,

Plaintiff,

V.

GURSTEL LAW FIRM, P.C., SHANNON N. CRANE,
WHITNEY M. JACOBSON, JESSE VASSALLO LOPEZ,

Defendants.

DECLARATION OF WHITNEY M. JACOBSON

I, Whitney M. Jacobson, declare and state the following

1. I am competent to testify as to the matters set forth herein. The facts stated within this declaration are within my personal knowledge and are true and correct.
2. I am employed by Defendant Gurstel Law, P.C. ("Gurstel Law Firm") as an associate attorney.
3. I live in the State of Arizona and do not own, lease or rent any property in the State of North Carolina.
4. I do not have and I have never had continuous or regular occurring contacts with the State of North Carolina.

5. As part of my responsibilities for Gurstel Law Firm, from October 2018 through mid-2019 I performed collection related work involving the defaulted credit card account that Plaintiff Legretta F. Cheek ("Plaintiff") held with Bank America N.A.

6. As part of this work, I mailed correspondence to the Plaintiff, to the address Plaintiff provided to Bank of America for the credit card account, at 7124 W Linda Lane, Chandler, Arizona 85226 ("Plaintiff's Arizona Address").


7. I also filed documents that relate to Plaintiff's credit card account with Superior Court of Arizona, County of Maricopa, for the matter titled Bank of America, N.A., Plaintiff, v. Legretta F. Cheek et al, Defendant ("Creditor Lawsuit"), Case Number, CV2018-156884.

8. I never reached into or contacted the Plaintiff in the State of North Carolina and I never sent any mailings or other documents to the State of North Carolina.

9. I have reviewed the Complaint filed in this case and I have not performed any activities directed to the State of North Carolina that relate to Plaintiff's claims.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

DATED: December 20, 2019


WHITNEY M. JACOBSON